JENNIFER MOUZIS 1 **Mouzis Criminal Defense** State Bar No. 200280 1819 K Street, Suite 200 3 Sacramento, California 95811 Telephone: (916) 822-8702 4 Facsimile: (916) 822-8712 5 Attorney for Defendant **AARON IRIBE** 6 7 IN THE UNITED STATES DISTRICT COURT 8 FOR THE EASTERN DISTRICT OF CALIFORNIA 9 10 UNITED STATES OF AMERICA. 2:21-CR-00189-KJM 11 Plaintiff, STIPULATION AND 12 ORDER TO EXTEND THE DEADLINE TO SUBMIT THE v. 13 SECURED BOND PACKAGE. 14 AARON IRIBE, 15 Defendant. 16 17 **STIPULATION** 18 Plaintiff, United States of America, by and through its counsel, Assistant United States 19 Attorney David Spencer, and defendant, Aaron Iribe, by and through his counsel, Jennifer 20 21 Mouzis, agree to extend the deadline to post the \$50,000 bond secured by real property or cash 22 with the Clerk's Office from close of business on 12/16/2021 to close of business on 12/23/2021. 23 The Defendant's last appearance on this case was December 2, 2021, where Defendant 24 appeared in court for Bail Review (ECF 23). Defendant was ordered released (ECF 29) with 25 Special Conditions of Pretrial Release (ECF 24). Pursuant to the December 2, 2021 minute order 26 (ECF 23), defendant is to post \$50,000 bond secured by real property or cash with the Clerk's 27 Office by close of business on 12/16/2021. 28

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There are multiple factors that delayed provision of a recent house appraisal for the secured bond; factors that are beyond control of the defendant or counsel for the defendant. For this reason, Defendant requires additional time to submit the house appraisal and post the secured bond. Defendant's counsel has communicated with AUSA Spencer regarding the delays, and AUSA Spencer has graciously agreed to enter into a stipulation to allow Defendant one extra week to provide the house appraisal and post the secured bond with the Clerk's Office.

All parties agree that it is in the best interest of the justice to a extend the deadline to post the \$50,000 bond secured by real property or cash with the Clerk's Office from close of business on 12/16/2021 to close of business on 12/23/2021. Accordingly, the parties respectfully request the Court adopt this proposed stipulation.

IT IS SO STIPULATED.

Dated: December 16, 2021 PHILLIP A. TALBERT Acting United States Attorney

By: /s/ David Spencer
DAVID SPENCER

Assistant United States Attorney

Dated: December 16, 2021

/s/ Jennifer Mouzis

JENNIFER MOUZIS

Attorney for Defendant

AARON IRIBE

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ORDER

IT IS HEREBY ORDERED, the Court having received, read, and considered the parties' stipulation, and good cause appearing therefrom, **ADOPTS** the parties' stipulation in its entirety as its order. Specifically, the Court orders that Defendant Aaron Iribe's deadline to post the \$50,000 bond secured by real property or cash with the Clerk's Office be **EXTENDED** from close of business on 12/16/2021 **to close of business on 12/23/2021**.

IT IS SO ORDERED.

Dated: December 20, 2021

/s/ Deborah Barnes

DEBORAH BARNES

UNITED STATES MAGISTRATE JUDGE